

EXHIBIT A

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE: WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION,

This Document Relates to: ALL CASES

Master Case No.: C09-0037 (MJP)

**PLAINTIFFS' MOTION TO SEAL
EXHIBIT 1 TO JASNOCH
DECLARATION IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO
PRECLUDE THE PROFFERED EXPERT
TESTIMONY OF SCOTT D. HAKALA**

NOTE ON MOTION CALENDAR:
August 10, 2012

PLAINTIFFS' MOTION TO SEAL EXHIBIT 1 TO JASNOCH
DECLARATION IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTION TO
PRECLUDE THE PROFFERED EXPERT
TESTIMONY OF SCOTT D. HAKALA
Case No. C09-037 MJP

SCOTT+SCOTT LLP
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: (619) 233-4565

party's trade secrets); (3) the interests of the parties and the balance of equities"; and (4) "the duty of the court to balance all of these competing interests and to inform the public of the basis for its decision." *See California ex rel. Lockyer v. Safeway, Inc.*, 355 F. Supp. 2d 1111, 1115 (C.D. Cal. 2005) (citing *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 602-04 (1978)).

II. Documents to be Sealed Are Claimed to Be Subject to Confidentiality Protections of the Protective Order

Exhibit 1 to the Jasnoch Declaration is the transcript of the June 8, 2012 deposition of Scott D. Hakala. This transcript contains several references to trading data which the third parties who produced the materials claim to be subject to confidentiality protections of the Protective Order. While Plaintiffs do not believe any of this material is, in fact, sensitive or confidential, this motion is being filed to comply with the terms of the Protective Order.

CONCLUSION

For the foregoing reasons, and on the basis of the authorities cited, Plaintiffs file this Motion to Seal Exhibit 1 to the Jasnoch Declaration in Support of Plaintiffs' Opposition to Defendants' Motion to Preclude the Proffered Expert Testimony of Scott D. Hakala.

Dated: August 1, 2012

Respectfully submitted,
SCOTT+SCOTT LLP

/s/ Anne L. Box
Anne L. Box (admitted *pro hac vice*)
John T. Jasnoch (admitted *pro hac vice*)
SCOTT+SCOTT LLP
707 Broadway, Suite 1000
San Diego, California 92101
Telephone: 619-233-4565
Fax: 619-233-0508
Email: abox@scott-scott.com
jjasnoch@scott-scott.com

PLAINTIFFS' MOTION TO SEAL EXHIBIT 1 TO JASNOCH
DECLARATION IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTION TO
PRECLUDE THE PROFFERED EXPERT
TESTIMONY OF SCOTT D. HAKALA
Case No. C09-037 MJP

SCOTT+SCOTT LLP
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: (619) 233-4565

Beth Kaswan (admitted *pro hac vice*)
Amanda F. Lawrence (admitted *pro hac vice*)
500 Fifth Avenue, 40th Floor
New York, New York 10110
Telephone: (212) 223-6444
Fax: (212) 223-6334
Email: bkaswan@scott-scott.com
alawrence@scott-scott.com

**COHEN MILSTEIN SELLERS &
TOLL PLLC**

Steven J. Toll
Joshua S. Devore (admitted *pro hac vice*)
S. Douglas Bunch (admitted *pro hac vice*)
1100 New York Avenue, N.W.
Suite 500, West Tower
Washington, DC 20005
Telephone: (202) 408-4600
Fax: (202) 408-4699
Email: stoll@cohenmilstein.com
jdevore@cohenmilstein.com
dbunch@cohenmilstein.com

Christopher Lometti (admitted *pro hac vice*)
Daniel B. Rehns (admitted *pro hac vice*)
88 Pine Street, 14th Floor
New York, New York 10005
Telephone: (212) 838-7797
Facsimile: (212) 838-7745
Email: clometti@cohenmilstain.com
drehns@cohenmilstein.com

Lead Counsel for the Class

PLAINTIFFS' MOTION TO SEAL EXHIBIT 1 TO JASNOCH
DECLARATION IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTION TO
PRECLUDE THE PROFFERED EXPERT
TESTIMONY OF SCOTT D. HAKALA
Case No. C09-037 MJP

SCOTT+SCOTT LLP
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: (619) 233-4565

TOUSLEY BRAIN STEPHENS PLLC

Kim D. Stephens, WSBA #11984
Janissa A. Strabuk, WSBA #21827
1700 Seventh Avenue, Suite 2200
Seattle, Washington 98101
Telephone: (206) 682-5600
Facsimile: (206) 682-2992
Email: kstephens@tousley.com
jstrabuk@tousley.com

Liaison Counsel for Plaintiffs and the Class

PLAINTIFFS' MOTION TO SEAL EXHIBIT 1 TO JASNOCH
DECLARATION IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTION TO
PRECLUDE THE PROFFERED EXPERT
TESTIMONY OF SCOTT D. HAKALA
Case No. C09-037 MJP

SCOTT+SCOTT LLP
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: (619) 233-4565

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2012, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 1, 2012.

/s/ Anne L. Box

Anne L. Box
SCOTT+SCOTT LLP
707 Broadway, Suite 1000
San Diego, California 92101
Telephone: 619-233-4565
Fax: 619-233-0508
Email: abox@scott-scott.com

PLAINTIFFS' MOTION TO SEAL EXHIBIT 1 TO JASNOCH
DECLARATION IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTION TO
PRECLUDE THE PROFFERED EXPERT
TESTIMONY OF SCOTT D. HAKALA
Case No. C09-037 MJP

SCOTT+SCOTT LLP
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: (619) 233-4565